

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
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DOC #:
DATE FILED: JUN 22 2017

UNITED STATES OF AMERICA

INDICTMENT

- v. -

JOHN CHAMBERS,

Defendant.

17 CRIM 396

COUNT ONE
(Bribery)

The Grand Jury charges:

1. From at least in or about 2010, up to and including in or about 2015, in the Southern District of New York and elsewhere, JOHN CHAMBERS, the defendant, willfully and knowingly did corruptly give, offer, and agree to give a thing of value to a person, with intent to influence and reward an agent of a local government and an agency thereof, which received in a one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, in connection with business, transactions, and series of transactions of such local government and agency involving a thing of value of \$5,000 and more, to wit, CHAMBERS offered and paid bribes to a member of the New York City Police Department ("NYPD") in order to expedite gun license related

Judge Pauley

matters pending before the NYPD's License Division and the Nassau County Police Department ("Nassau PD") Pistol Section for the benefit of individuals who had paid CHAMBERS for his assistance in such gun license related matters.

(Title 18, United States Code, Sections 666 and 2.)

COUNT TWO
(Conspiracy to Commit Bribery)

The Grand Jury further charges:

2. From at least in or about 2010, up to and including in or about 2015, in the Southern District of New York and elsewhere, JOHN CHAMBERS, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Section 666.

3. It was a part and an object of the conspiracy that JOHN CHAMBERS, the defendant, and others known and unknown, willfully and knowingly would and did corruptly give, offer, and agree to give a thing of value to a person, with intent to influence and reward an agent of a local government and an agency thereof, which received in a one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of

Federal assistance, in connection with business, transactions, and series of transactions of such local government and agency involving a thing of value of \$5,000 and more, to wit, CHAMBERS agreed to pay bribes to a member of the NYPD in exchange for the NYPD officer's assistance with gun license related matters pending before the NYPD and the Nassau PD, in violation of Section 666(a)(2) of Title 18 of the United States Code.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. From at least in or about 2010 to in or about 2015, JOHN CHAMBERS, the defendant, met on numerous occasions with NYPD Sergeant David Villanueva, who at the time was a Sergeant of the NYPD assigned to the NYPD License Division, at One Police Plaza, in Manhattan, New York in order to obtain Villanueva's assistance in expediting gun license matters pending before the NYPD License Division and the Nassau PD Pistol Section.

b. On at least three occasions between 2012 and 2015, JOHN CHAMBERS, the defendant, mailed cash, hidden inside magazines, to NYPD Sergeant David Villanueva.

(Title 18, United States Code, Section 371.)

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; and Title 28, United States Code, Section 2461.)


FOREPERSON


JOON H. KIM ADG
ACTING UNITED STATES ATTORNEY

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- v. -

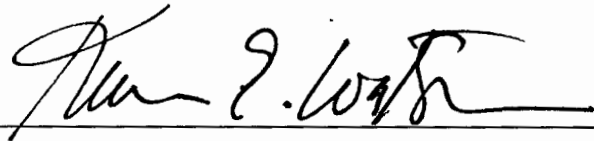
JOHN CHAMBERS,

Defendant.

INDICTMENT

17 Cr. ____ (____)

(Title 18, United States Code, Sections 371 and 666.)



JOON H. KIM

Acting United States Attorney.

6/22/17 FILED INDICTMENT CASE ASSIGN TO J. RAULET

COT, USM